DREDF

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Ultra-Wideband, ET Docket 98-153

Dear Ms. Salas:

On behalf of Disability Rights Education and Defense Fund (DREDF), I am writing to urge the Commission to move forward without delay in approving the use of the spectrum above 2 GHz for communications systems involving Ultra-wideband (UWB), low-power, short-range technology. This technology has the potential to enhance independent living for persons with disabilities, by making local area networking (LAN) easier and more affordable through high-capacity low cost wireless networking.

DREDF is a national law and policy center dedicated to protecting and advancing the civil rights of people with disabilities through legislation, litigation, advocacy, technical assistance, and the education and training of attorneys, advocated, persons with disabilities, and parents of children with disabilities. DREDF applauds the many initiatives the Commission has undertaken over the years to make basic telecommunications services accessible and available to persons with disabilities, allowing them to be more connected with our increasingly connected society.

Ultra-wideband services have the potential to unlock a whole new world of services for people with disabilities. Perhaps most importantly, UWB networking has the potential to significantly enhance independent living. For example, UWB will make it possible to monitor and provide emergency assistance more easily to those living independently. In the event of trouble, a simple device carried with them or worn could bring help quickly. Additionally, UWB can make "smart home" technology a reality, allowing voice activation of lights, televisions, computers, security systems, appliances, and other networked devices for people with limited mobility. These potential services are also being examined by hospitals as a way to monitor patients more effectively and inexpensively. Furthermore, UWB can help bridge the digital divide, very literally – a UWB networked computer gives a person with limited mobility the power to connect to a

high-speed, high-capacity Internet connection without being constrained by the placement of telephone jacks or tangles of network wires.

We also ask the Commission to urge the developers of UWB technologies to consider the needs of persons with disabilities as products using this technology are brought to market. Many technologies have developed over the years which had the potential to dramatically enhance the living of persons with disabilities. Unfortunately, many of these technologies failed to assure basic disability access in the early stages of planning. Previous examples, such as the inclusion of closed captioning on television sets (which costs only $.25 per TV set, yet makes a tremendous difference in the ability of disabled persons to "view" TV), have shown that making products accessible at an early stage in the planning process for products can create a "win-win" situation for both manufacturers and members of the disability community (as well as the general public). The potential of UWB is such that the needs of the disability community must be considered in the creation of new UWB devices.

Some commenters in this proceeding have expressed concerns that UWB products may cause interference with GPS and other services used by the aviation industry for positioning purposes. However, it is our understanding that almost all of this potential interference occurs below 2 GHz, an area of the spectrum that many UWB applications will never use. We urge the Commission to move forward as expeditiously as possible to make UWB technology – and particularly UWB technology above the 2 GHz level – available to the public. The potential impact on the disabled community, particularly those with limited mobility seeking independent living, cannot be underestimated.

Sincerely,

Susan R. Henderson
Director of Administration